

**RESPONSE TO COMMENTS**

**ADDENDUM NO. 1 TO ORDER NO. 2000-10**

**MASTER RECYCLED  
WATER PERMIT FOR THE PRODUCTION AND PURVEYANCE OF  
RECYCLED WATER FOR SAN ELIJO JOINT POWERS  
AUTHORITY, SAN DIEGUITO WATER DISTRICT  
SANTA FE IRRIGATION DISTRICT, AND  
CITY OF DEL MAR, SAN ELIJO WATER  
RECLAMATION FACILITY,  
SAN DIEGO COUNTY**

The San Diego Water Board has the following responses to the San Elijo Joint Powers Authority (SEJPA) letter dated December 18, 2012:

<b>No.</b>	<b>Section</b>	<b>Comments</b>	<b>San Diego Water Board Responses</b>
1.	Findings	Add a finding that says "SEJPA has requested authorization to deliver recycled water to Olivenhain Municipal Water District (OMWD) for distribution within the same Hydrologic Areas and Hydrologic Subareas that have already been approved by the Regional Board in Order No. 2000-10.	A new finding has been added as Finding No. 8.
2.	Finding No. 5	Add to the end of the last sentence" ... Hydrologic Subareas, including the OMWD service area."	See Finding No. 8 in the revised tentative Addendum.
3.	Finding No. 6	The San Elijo groundwater basin is listed as a Tier D-2 groundwater basin. According to page 3-18 of the Guideline for Salinity/Nutrient Management Planning in the San Diego Region (SNMP), "Recycled water compliance with existing Basin Plan salinity objectives is not a concern within the Tier D basins. As a result, salinity management plans are not required within Tier D basins." Therefore, no schedule for developing a SNMP should be required. It is clearly stated in the guidelines that the SNMP is not required for Tier D basins and making this requirement in the recycled water permit is a misuse of public funds.	The San Diego Water Board acknowledges that the salt and nutrient management planning guidelines designate the San Elijo groundwater basin as a Tier D-2 basin. The guidelines also recommend that salt and nutrient management plans should not be required for Tier D-2 basins, since recycled water compliance with existing basin plan water quality objectives is not a concern within these basins.  Original finding No. 6 has been deleted from the tentative Addendum. This is the finding that contained the reference to the State Recycled Water Policy requirements for a Salt and Nutrient Management Plan. The requirement for the SEJPA to submit a schedule for developing a salt and nutrient

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			<p>management plan has also been deleted from the tentative Addendum. Instead San Diego Water Board staff will work with the San Diego County Water Authority to incorporate salt and nutrient management plan elements for Tier D basins in the next version of the Region's Integrated Regional Water Management Plan.</p>
4.	Finding No. 7	<p>Replace finding #7 with the following:</p> <p>"The San Diego Water Board adopted Resolution No. R9-2009-0125 on November 10, 2010, which endorsed the Guidelines for Salinity/Nutrient Management Planning in the San Diego Region (SNMP Guidelines). SEJPA's recycled water use areas are within the Batiquitos Hydrologic Subarea (904.51), the San Elijo Hydrologic Subarea (904.61), and the Solana Beach Hydrologic Area (905.10). In accordance with criteria established in the SNMP Guidelines, groundwater within HSA 904.51, <del>904.61</del>, <u>904.61</u>, and HA 905.10 are defined as "Tier D-2" groundwater basins and recycled water use is in compliance with existing Basin Plan groundwater quality objectives. The adopted SNMP Guidelines do not require the preparation of salt and nutrient management plans for Tier D-2 basins, as existing Basin Plan objectives in the Tier D-2 basins are deemed adequate for purposes of protecting groundwater quality and encouraging recycled water use. Therefore, the SEJPA recycled water permit (Permit No. 2000-10) is in compliance with the intent and desire of both the SNMP Guidelines and the State Recycled Water Policy."</p>	<p>See response to comment No. 3 above. In addition, Finding No 7 has been renumbered to Finding No. 6 and revised as follows:</p> <p>The San Diego Water Board adopted Resolution No. R9-2009-0125 on November 10, 2010, which endorsed the Guidelines for Salinity/Nutrient Management Planning in the San Diego Region (salt and nutrient management plan guidelines). <sup>1</sup> <u>The San Elijo groundwater basin is identified as a Tier D-2 basin in the salt and nutrient management plan guidelines. The Tier D-2 basins are small coastal basins which that are not currently used for developing public water supplies, and in which recycled water compliance with water quality objectives is not generally a concern. As a result, the salt and nutrient management plan guidelines recommend that salt and nutrient management plans should not be required for Tier D-2 basins.</u></p>
5.	Heading	Typo: "Order No. R9-2000-10"	The requested change has been made

<sup>1</sup> The salt and nutrient management plan guidelines can be found at [http://www.waterboards.ca.gov/sandiego/board decisions/adopted orders/2010/R9-2010-0125 SNMP.pdf](http://www.waterboards.ca.gov/sandiego/board%20decisions/adopted%20orders/2010/R9-2010-0125%20SNMP.pdf).

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No.	Section	Comments	San Diego Water Board Responses
		should be "Order No. 2000-10"	in the revised tentative Addendum
6.	A.5	Current rating of dynasand filter is 2.88 MGD (5 gpm/sf x 400 sf = 2,000 gpm or 2.88 MGD). Please change "2.48 MGD" to "2.88 MGD".	The requested change has been made in the revised tentative Addendum.
7.	A.7	First paragraph implies that the tertiary treatment facilities may be operated in excess of 3.02 MGD. Change first paragraph to: "SEWRF may not operate the new MF/RO equipment for distribution to water purveyors unless"	The requested change has been made in the revised tentative Addendum.
8.	A.7.c	This paragraph implies that the tertiary treatment facilities may be operated in excess of 3.02 MGD. Change to: "The San Diego Water Board has notified the Discharger by letter that operation of the expanded tertiary treatment facilities may be initiated."	The requested change has been made in the revised tentative Addendum.
9.	E.21	Remove this section from the Addendum based on the comment to Finding # 7 above.	The referenced Section E.21 has been deleted from the original tentative addendum. In addition see response to comment No. 3.
10.	E.22	Revise this section as follows: "SEJPA will supply nutrient information annually to our recycled water purveyors so that the water purveyors can distribute the information to their customers and promote the use of best management practices for irrigation. Nutrient information that will be provided to purveyors is defined in section B.1 of the effluent monitoring program. This will allow the purveyors to promote healthy landscapes, appropriate irrigation rates, and avoid nutrient overload."	<p>The requested change has not been made. The tentative Addendum requires the SEJPA to submit an operations and management plan to enable the San Diego Water Board assess steps being taken to ensure nutrients in recycled water are not applied at rates that exceed demand of vegetation.</p> <p>Also note that, the subject section has been modified as follows to include the operations and management plan provisions from the Recycled Water Policy:</p> <p>The SEJPA must submit an operations and management plan (plan) no later than <u>December 13</u> <del>November 14</del>, 2013 which identifies measures it (or its users) will implement to ensure <u>that conditions a-c below are met. Upon approval of the plan by the San Diego Water Board, the SEJPA shall</u></p>

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			<p><u>implement the plan. In lieu of submitting a plan, the SEJPA or applicable recycled water purveyors can add requirements to their Recycled Water Rules and Regulations to ensure that conditions a-c below are met.</u></p> <p>a. Nutrient loading to use areas from application of recycled water and fertilizers <del>must will</del> not exceed nutrient demands of landscape vegetation (recycled water must be applied at agronomic rates). Measures that the SEJPA or its users may implement include communicating to users the nutrient levels in recycled water, appropriate use of fertilizers, development of water budgets for use areas, site supervisor training, periodic inspections, tiered rate structures, use of smart controllers, or other appropriate measures. The operations and management plan shall be sufficient to accommodate necessary adjustments in nutrient levels as may be required by the specific vegetation (e.g., turfgrass, natural vegetation landscapes, etc.) at the end use sites. <del>Upon approval of the Plan by the San Diego Water Board, the SEJPA shall implement the Plan.</del></p> <p><u>b. Implementation of a plan that may apply to multiple use sites and provides for detection of leaks, (for example from broken sprinkler heads,) and correction either within 72 hours of learning of the release of the runoff, or prior to the release of 1,000 gallons, whichever occurs first.</u></p> <p><u>c. Proper design and aim of sprinkler heads.</u></p>

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11.	B.1	Priority Pollutants are required to be monitored once per year in the State Recycled Water Policy. Request that the new semiannual monitoring requirement be changed to annual monitoring.	This comment is incorrect. At the time the tentative Addendum was sent to SEJPA, the Recycled Water Policy required priority pollutant monitoring twice annually. A draft amendment to the Recycled Water Policy, however, was adopted by the State Water Board on January 22, 2013, and changed the monitoring frequency for priority pollutants from twice annually to once annually. This amendment will become effective after the amended Recycled Water Policy is approved by the Office of Administrative Law. As a result, the tentative Addendum has been modified to allow for monitoring of priority pollutants as required in the Recycled Water Policy (see Table 1 of revised tentative Addendum).
12.	Monitoring and Reporting Program No. 2000-10	Monitoring & Reporting Program No. 2000-10 currently has two sections labeled "Section D." We assume you are intending to modify the second one called "Section D Reporting". Modify the Tentative Amendment to replace "Section D Reporting" with the new "Section E Reporting" as written in the Addendum.	The requested revision has been made in the revised tentative Addendum.
13.	Several sections of Order No. 2000-10 and Monitoring and Reporting Program No. 2000-10	Replace "State Department of Health Services and the County of San Diego Department of Environmental Health" with "State Department of Health Services OR the County of San Diego Department of Environmental Health" throughout the entire permit. Current Permit M&RP implies that the permittee is regulated by both agencies. Having duplicate oversight is onerous and creates confusion.	No change was made to the referenced sections of Order No. R9-2000-10 since the San Diego Water Board understands that the SEJPA is currently regulated by both the California Department of Public Health and the County of San Diego Department of Environmental Health.
14.	Finding No. 7	Coordinate SNMP requirements with State WQCB staff (Jon Bishop) to ensure that State Recycled Water Policy is being applied appropriately.	The San Diego Water Board has discussed the salt and nutrient management plan requirements with State Water Board staff. The tentative addendum has been modified to ensure that the requirements are consistent with the Recycled Water Policy.

The San Diego Water Board has the following responses to WateReuse California’s letter dated December 18, 2012:

Comment	San Diego Water Board Response
<p>WateReuse California recommended that the requirement for submittal of a schedule to develop a salt and nutrient management plan be removed from the tentative addendum, or that the San Diego Water Board should acknowledge that a full scale salt and nutrient management plan (SNMP) is not needed. The following facts were given in its letter as rationale for comments made:</p> <ol style="list-style-type: none"> <li>1. With adoption of Resolution No. R9-2010-0125, <i>A Resolution Endorsing The Proposed Guidelines For Salinity and Nutrient Management Planning in the San Diego Region</i>, by the Regional Water Board, the Regional Water Board established that groundwater in the basin supplied with SEJPA’s recycled water (the San Elijo groundwater basin) is a Tier D-2 basin, which is a “[m]oderate to small-sized coastal or inland groundwater basin within the MWDSC service area with higher salinity groundwater quality and existing Basin Plan groundwater quality objectives for TDS that exceed 1200 mg/l. Recycled water compliance with existing Basin Plan TDS objectives is not a problem within these basins.” Resolution No. R9-2010-0125 also established the Regional Water Board’s concurrence with the notion that SNMPs “are not required within the Tier D basins” (see page 3-18 of <i>Guidelines</i>) since SNMPs in such basins would not provide any benefit to protection of beneficial uses.</li> <li>2. State Water Resources Control Board (SWRCB) acknowledges that a full-scale SNMP is not appropriate or necessary in all basins and that an alternative compliance approach is appropriate in some cases. For example, full-scale SNMPs are not required in numerous basins in the jurisdiction of the North Coast Regional Water Quality Control Board, and such basins will instead be monitored to verify salt and nutrient conditions are stable and further measures are unnecessary. I encourage your staff to communicate with Mr. Jon Bishop at SWRCB on this matter.</li> </ol>	<p>The San Diego Water Board acknowledges that the salt and nutrient management planning guidelines designate the San Elijo groundwater basin as a Tier D-2 basin. The guidelines also recommend that salt and nutrient management plans should not be required for Tier D-2 basins, since recycled water compliance with existing basin plan water quality objectives is not a concern within these basins.</p> <p>Original finding No. 6 has been deleted from the tentative Addendum. This is the finding that contained the reference to the State Recycled Water Policy requirements for a Salt and Nutrient Management Plan. The requirement for the SEJPA to submit a schedule for developing a salt and nutrient management plan has also been deleted from the tentative Addendum. Instead San Diego Water Board staff will work with the San Diego County Water Authority to incorporate salt and nutrient management plan elements for Tier D basins in the next version of the Region’s Integrated Regional Water Management Plan.</p>

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<p>3. Addition of Advanced Water Treatment by SEJPA to the existing recycled water system as permitted by Tentative Addendum #1 will reduce the salt load on the service area and the hydrologic areas that have already been receiving recycled water for 12 years.</p>	

The San Diego Water Board has the following responses to the San Diego County Water Authority's (SDCWA) letter dated December 18, 2012:

Comment	San Diego Water Board Response
<p>The following is from the SDCWA letter:</p> <p>The purpose of this letter is to provide comments on the requirement in the proposed tentative order for San Elijo JP A to submit a schedule for developing a salt and nutrient management plan (SNMP) for the San Elijo groundwater basin. To advance development of SNMPS, the San Diego County Water Authority worked with the Southern California Salinity Coalition and Regional Board staff to prepare guidelines for the development of SNMPS for the San Diego Region. These guidelines were approved by the Regional Board through the adoption of Resolution R9-2010-0125, <i>A Resolution Endorsing the Proposed Guidelines for Salinity and Nutrient Management Planning in the San Diego Region</i>. The purpose of the guidelines was to focus efforts in the San Diego Region on those groundwater basins where the development of a SNMP would bring some value in improving or maintaining groundwater quality. The Water Authority has further supported the development of five salt and nutrient management plans in the San Diego Region by obtaining funding from the Department of Water Resources through an integrated regional water management planning grant.</p> <p>In the guidelines, there was an understanding that for Tier D basins, primarily coastal basins which are high in total dissolved solids (TDS) concentrations, there would be no requirement to develop a SNMP. This approach is consistent with what the State Board has allowed in other regions of the State. Per the guidelines, the San Elijo basin is a Tier D-2 basin. Therefore, a salt and nutrient management plan should not be required. We respectfully request that this</p>	<p>The San Diego Water Board acknowledges that the salt and nutrient management planning guidelines designate the San Elijo groundwater basin as a Tier D-2 basin. The guidelines also recommend that salt and nutrient management plans should not be required for Tier D-2 basins, since recycled water compliance with existing basin plan water quality objectives is not a concern within these basins.</p> <p>Original finding No. 6 has been deleted from the tentative Addendum. This is the finding that contained the reference to the State Recycled Water Policy requirements for a Salt and Nutrient Management Plan. The requirement for the SEJPA to submit a schedule for developing a salt and nutrient management plan has also been deleted from the tentative Addendum. Instead San Diego Water Board staff will work with the San Diego County Water Authority to incorporate salt and nutrient management plan elements for Tier D basins in the next version of the Region's Integrated Regional Water Management Plan.</p>

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Comment	San Diego Water Board Response
requirement be removed from San Elijo JPA's permit	